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10 UNITED STATES DISTRICT COURT
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12 NORTHERN DISTRICT OF CALIFORNIA
13
14 SAN FRANCISCO DIVISION

15 LEOVARDO PARAMO,
16 Plaintiff,
17 v.
18 BORAL STONE PRODUCTS, LLC,
19 Defendant.

20 Case No. 3:13-CV-02344-NC

21 *[Assigned to the Honorable Nathanael
Cousins, Courtroom A, 15th Floor]*

22 **STIPULATION AND [PROPOSED]
ORDER SEEKING REMOVAL
FROM COURT MEDIATION AND
REFERRING TO PRIVATE ADR**

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24 Plaintiff Leovardo Paramo ("Plaintiff") and Defendant Boral Stone Products,
25 LLC ("Defendant"), by and through their respective counsel of record, enter into
26 the stipulation below based on the following facts:

27 **RECITALS**

28 WHEREAS the Court assigned the above-entitled matter out to mediation
under ADR Local Rule 6.

WHEREAS the Parties have agreed to submit this matter to private
mediation to be conducted on January 9, 2014 in San Francisco, California. The
Parties agreed to private mediation and made all necessary arrangements prior to

29
30 **STIPULATION AND [PROPOSED] ORDER SEEKING REMOVAL FROM COURT
MEDIATION AND REFERRING TO PRIVATE ADR**

1 receiving the Notice of Assignment of Mediator.

2 WHEREAS the Parties wish to proceed forward with the private mediation
3 as currently scheduled so as to avoid any scheduling issues.

4 THEREFORE, the Parties jointly request that the Court revoke the Order
5 appointing a mediator and permit the Parties to proceed forward with the private
6 mediation as scheduled.

7 **STIPULATION**

8 Based on the foregoing Recitals, the Parties hereby stipulate as follows:

9 1. The Parties request that the Court vacate the Order and Notice of
10 Assignment of Mediator.

11 2. The Parties agree to participate in private mediation and will complete
12 the private mediation by or before the January 31, 2014 deadline set by the Court.

14 Dated: December 2, 2013

Michael H. Kim., P.C.

16 By: 

Michael H. Kim, Esq.
Attorneys for Plaintiff
LEOVARDO PARAMO

18 Dated: December 1, 2013

LATHROP & GAGE LLP

21 By: 

Lauren J. Katunich, Esq.
Jack Rowe, Esq.
Attorneys for Defendant
BORAL STONE PRODUCTS LLC

ORDER

IT IS SO ORDERED.

Based on the parties' Joint Stipulation and good cause appearing, the Court hereby orders as follows:

1. The Court revokes the Order dated November 19, 2013 appointing mediator Margaret Hart Edwards, and permits the Parties to proceed forward with private mediation as scheduled.

Dated: December 3, 2013

